

EXHIBIT 1

From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>
Sent: Saturday, September 21, 2024 8:01 AM
To: Swiber, Patrick; Boccuzzi Jr., Carmine D.
Cc: Ira M. Levin; Danielle J. Gould; Jolisa Warmack
Subject: Re: Iconic et al v. Bosch

This Message Is From an External Sender

Attention: This message originated from an external email domain.

Patrick:

Just a note that this didn't fall off my plate. We are reviewing the issues, timing, and schedules a little closer, and we will follow up next week on this.

Have a nice weekend.

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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Effective January 1, 2024, the Corporate Transparency Act (CTA) will require many legal entities to file certain information with the Financial Crimes Enforcement Network (FinCEN). Please contact your Burke Warren attorney to discuss your compliance obligations.

From: Swiber, Patrick <pswiber@cgsh.com>
Sent: Friday, September 20, 2024 4:17 PM
To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>
Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>
Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Yes—please list Carmine as the signer. Thanks!

Patrick Swiber

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One Liberty Plaza, New York NY 10006
T: +1 212 225 2928
pswiber@cgsh.com | clearygottlieb.com

From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>
Sent: Friday, September 20, 2024 5:16 PM
To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>
Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>
Subject: Re: Iconic et al v. Bosch

Thanks. I presume I have your authority to apply your /s/ signature to the stipulation? Please confirm.

Joshua J. Cauhorn | *Partner*

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From: Swiber, Patrick <pswiber@cgsh.com>
Sent: Friday, September 20, 2024 4:13 PM
To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>
Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>
Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Thanks, Josh. We can do 12/13.

Patrick Swiber

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One Liberty Plaza, New York NY 10006
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From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>
Sent: Friday, September 20, 2024 4:55 PM
To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>
Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>
Subject: Re: Iconic et al v. Bosch

Patrick:

These edits are fine.

We were just advised by the courtroom deputy that 12/6 is too close in time to the date of the reply. The court has 12/13 available, but if that doesn't work for you, can you provide your availability for subsequent Fridays?

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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From: Swiber, Patrick <pswiber@cgsh.com>

Sent: Friday, September 20, 2024 3:38 PM

To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Josh,

Our minor edits are attached. December 6 works for us, and we added that to the draft.

Thanks,
Patrick

Patrick Swiber

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From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Sent: Friday, September 20, 2024 3:18 PM

To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: Re: Iconic et al v. Bosch

Patrick:

Let me know if the attached stipulation and order work.

Per Judge Breyer's standing order, we understand that hearing on this motion will be on a Friday at 10:00 a.m. Would either December 6 or December 13 work for your office? We can confirm date(s) that work for both parties with Judge Breyer's deputy before submitting the stipulation and order.

Thanks,
Josh

Joshua J. Cauhorn | *Partner*

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From: Swiber, Patrick <pswiber@cgsh.com>

Sent: Tuesday, September 17, 2024 9:58 AM

To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Josh,

We can agree to October 30 for Plaintiffs' opposition provided Plaintiffs agree to November 26 for our reply. If that's acceptable, please send a draft stipulation for our review.

Thanks,
Patrick

Patrick Swiber

Cleary Gottlieb Steen & Hamilton LLP

Assistant: mdigiario@cgsh.com

One Liberty Plaza, New York NY 10006

T: +1 212 225 2928

pswiber@cgsh.com | clearygottlieb.com

From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Sent: Tuesday, September 17, 2024 6:40 AM

To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

Patrick:

Having now reviewed the Bosch Defendants' motion, I write to seek your agreement to additional time to respond. Plaintiffs' response is currently due on September 25. Due to the complexity of this motion, that there was not a scheduling order in place, and that I have three other cases in robust discovery and pretrial matters, including at least 10 substantive depositions over the next month and a trial in Delaware bankruptcy court starting at the end of October, our office needs until October 30 to respond to the motion.

Please advise if you have any objection. We can then prepare the proper papers.

Thank you in advance for your consideration.

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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From: Swiber, Patrick <pswiber@cgsh.com>

Sent: Friday, September 13, 2024 6:20 AM

To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Josh,

My colleague sent those documents to members of your team by FTP earlier this week—please see attached. We will send the FTP link to you as well later today.

Thanks,
Patrick

Patrick Swiber

Cleary Gottlieb Steen & Hamilton LLP

Assistant: mdigiario@cgsh.com

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T: +1 212 225 2928

pswiber@cgsh.com | clearygottlieb.com

From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Sent: Friday, September 13, 2024 7:17 AM

To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: Re: Iconic et al v. Bosch

Patrick:

Please forward a copy of the unredacted motion and exhibits at your earliest convenience.

Thank you.

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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Effective January 1, 2024, the Corporate Transparency Act (CTA) will require many legal entities to file certain information with the Financial Crimes Enforcement Network (FinCEN). Please contact your Burke Warren attorney to discuss your compliance obligations.

From: Swiber, Patrick <pswiber@cgsh.com>

Sent: Wednesday, September 11, 2024 4:12 PM

To: Joshua J. Cauhorn <jcauhorn@burkelaw.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

[EXTERNAL]

Josh,

As you have likely seen, the Bosch Defendants moved for summary judgment earlier today. If granted, that motion would of course eliminate any need to resolve the trial admissibility issues addressed in the stipulations you provided. We can revisit the stipulations if any claims remain after the court resolves the motion.

Thanks,
Patrick

Patrick Swiber

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T: +1 212 225 2928

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From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Sent: Monday, September 9, 2024 12:24 PM

To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

Hi Patrick:

Following up. Please provide an update.

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Sent: Monday, August 26, 2024 11:23 AM

To: Swiber, Patrick <pswiber@cgsh.com>; Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

Patrick:

Thanks. Please provide an update.

Best,
Josh

Joshua J. Cauhorn | *Partner*

P 312-840-7055 | F 312-840-7900 | M 260-582-1229 | jcauhorn@burkelaw.com | www.burkelaw.com

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From: Swiber, Patrick <pswiber@cgsh.com>

Sent: Wednesday, August 7, 2024 10:21 AM

To: Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>; Joshua J. Cauhorn <jcauhorn@burkelaw.com>

Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@BurkeLaw.com>

Subject: RE: Iconic et al v. Bosch

Some people who received this message don't often get email from pswiber@cgsh.com. [Learn why this is important](#)

[EXTERNAL]

Josh,

Carmine asked me to get back with you about your email below. We're looking at the draft stipulations and will review them with our client. Thanks for your patience as we catch up following Zach's departure.

Thanks,
Patrick

Patrick Swiber

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From: Joshua J. Cauhorn <jcauhorn@burkelaw.com>
Sent: Tuesday, July 30, 2024 12:20 PM
To: Boccuzzi Jr., Carmine D. <cboccuzzi@cgsh.com>
Cc: Ira M. Levin <ILevin@burkelaw.com>; Danielle J. Gould <DGould@burkelaw.com>; Jolisa Warmack <JWarmack@Burkelaw.com>
Subject: Iconic et al v. Bosch

Carmine:

We have been working through Rule 37 issues with Zach, who I understand is leaving your firm. He is a great attorney. We appreciated working with him.

He asked us to pick up the issues with you. Attached is the email string memorializing our discussions to date. Also attached are proposed stipulations in accordance with those discussions.

Please advise Bosch's position on the attached stipulations, which should resolve a significant portion of the parties' dispute regarding Bosch's responses to Plaintiffs' requests for admission.

Thank you.

Best,
Josh

Joshua J. Cauhorn

Partner

Burke, Warren, MacKay & Serritella, P.C.
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BURKE, WARREN,
MACKAY & SERRITELLA, P.C.

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